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8 Attorney for Defendant, JOHN DOE  
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12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**  
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15 IN RE Rule 45 Subpoenas served on )  
16 GOOGLE and NETFLIX )

Misc Case No. \_\_\_\_\_  
Lead Case: MD FL 8:20-cv-00676-MSS-CP]

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18 STRIKE 3 HOLDINGS, LLC, )  
19 Plaintiff, )

DECLARATION OF J. CURTIS  
EDMONDSON IN SUPPORT OF JOHN  
DOE'S MOTION TO QUASH AND FOR  
A PROTECTIVE ORDER

20 vs. )

21 JOHN DOE infringer identified as using )  
22 IP address 47.197.99.186,. )

23 Defendant. )  
24 ----- )

1 I, J. Curtis Edmondson hereby declare under the penalty of perjury under the laws of the  
2 United States of America the following:

- 3 1. Attached as Exhibit 1 is a true and correct copy of the relevant portions of the local rules  
4 of the Middle District of Florida requiring discovery to be served 30 days before the  
5 close of discovery.
- 6 2. Attached as Exhibit 2 is a true and correct copy of the Court's last scheduling order.  
7 Fact discovery is closed and the last scheduling order set the close of discovery on  
8 March 16, 2022.
- 9 3. Attached as Exhibit 3 is a true and correct copy of Strike 3's subpoena on Google.
- 10 4. Attached as Exhibit 4 is a true and correct copy of Strike 3's subpoena on Netflix.
- 11 5. The parties met and conferred on this issue. Strike 3's counsel stated that subpoenas on  
12 third parties requiring a return of documents in less than 30 days is proper under Rule  
13 45. There was no resolution.
- 14 6. Counsel for John Doe has spent 5 hours. John Doe's counsel has a billing rate for  
15 Strike 3 copyright cases of \$ 350.00 per hour, which is less than a reasonable rate for  
16 copyright litigators with 15 years of experience in the Northern District of California.  
17 The fee for filing this motion is \$ 402.00. I expect to spend another five hours on the  
18 reply brief and oral argument, for a total requested fee award for \$ 3,902.00.

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21 Dated: March 19, 2022

22 BY: /s/J. Curtis Edmondson  
23 Declarant  
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